

EXHIBIT B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p>Plaintiff-Applicant,</p> <p>v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p>Defendant.</p>	<p>Adv. Pro. No. 08-01789 (SMB)</p> <p>SIPA LIQUIDATION</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p>Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>STANLEY I. LEHRER, in his capacity as administrator of the Stanley I. Lehrer and Stuart M. Stein, J/T WROS; STUART M. STEIN, individually, and in his capacity as administrator of the Stanley I. Lehrer and Stuart M. Stein, J/T WROS; ARTHUR SISKIND; LINDA SOHN; NEAL GOLDMAN; DOUGLAS ELLENOFF; ELAINE STEIN ROBERTS; ARTHUR J. FEIBUS; EUNICE CHERVONY LEHRER; ELAINE S. STEIN; ELAINE S. STEIN REVOCABLE TRUST; JAMAT COMPANY, LLC; THE MESTRO COMPANY; TRUST U/W/O DAVID L. FISHER; TRUST U/T/A 8/20/90; and EVELYN FISHER, individually, and in her capacity as Trustee for TRUST U/W/O DAVID L. FISHER and TRUST U/T/A 8/20/90,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-05259 (SMB)</p>

ORDER PURSUANT TO RULES 15 AND 21 OF THE FEDERAL RULES OF CIVIL PROCEDURE, AS INCORPORATED BY RULES 7015 AND 7021 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE, GRANTING THE TRUSTEE LEAVE TO FILE A SECOND AMENDED COMPLAINT AND FOR RELATED RELIEF

Upon the motion dated December 7, 2015 (the “Motion”) of Irving H. Picard (the “Trustee”), as Trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC and the substantively consolidated estate of Bernard L. Madoff under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, seeking entry of an order, pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, granting the Trustee’s request for leave to file a Second Amended Complaint and for Related Relief; and the Court having considered the Memorandum of Law in Support of the Trustee’s Motion for Entry of an Order Pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as Incorporated by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, Granting the Trustee Leave to File a Second Amended Complaint and for Related Relief; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

ORDERED THAT:

1. The relief requested in the Motion is granted in its entirety;
2. The Trustee is granted leave to file his Second Amended Complaint; and
3. The caption for this adversary proceeding is amended and shall appear as indicated in Exhibit A to this order.

Dated: New York, New York
_____, 20__

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p>Plaintiff-Applicant,</p> <p>v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p>Defendant.</p>	<p>Adv. Pro. No. 08-01789 (SMB)</p> <p>SIPA LIQUIDATION</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p>Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>STANLEY I. LEHRER, in his capacity as administrator of the Stanley I. Lehrer and Stuart M. Stein, J/T WROS; STUART M. STEIN, individually, and in his capacity as administrator of the Stanley I. Lehrer and Stuart M. Stein, J/T WROS; ARTHUR M. SISKIND; LINDA SOHN; NEAL GOLDMAN; ELAINE STEIN ROBERTS; ARTHUR J. FEIBUS; EUNICE CHERVONY LEHRER; TRUST U/T/A 8/20/90; EVELYN FISHER, individually, and in her capacity as Trustee for TRUST U/T/A 8/20/90; and RONI L. STEIN,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-05259 (SMB)</p>